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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, et al.,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.	:
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**GENERAL MOTORS LLC’S COUNTER-DESIGNATION
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD
ON APPEAL REGARDING THE APPEALS OF THE
BANKRUPTCY COURT’S JULY 12, 2017 OPINION [ECF NO. 13992]**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), General Motors LLC (“**New GM**”) submits this counter-designation of additional items to be included in the record on appeal in connection with the appeals of the *Memorandum Opinion and Order Deciding Certain 2016 Threshold Issues*, dated July 12, 2017 [ECF No. 13992] (the “**July 2017 Opinion**”).

COUNTER-DESIGNATION OF RECORD

In addition to the items designated by Appellants in their Statements of Issues on Appeal and Designations of Record on Appeal [ECF Nos. 14034, 14035, 14036, 14040 and 14042],¹ New GM submits the following designation of additional items to be included in the record on appeal of the July 2017 Opinion (including any exhibit, annex, appendix or addendum thereto):

<u>Item No.</u>	<u>Date Filed</u>	<u>Description</u>	<u>Docket No.</u>
1.	8/08/14	Agreed And Disputed Stipulations Of Fact Pursuant To The Court's Supplemental Scheduling Order, Dated July 11, 2014	12826
2.	8/19/2015	Case Management Order Re: No-Strike, No Stay, objection, and GUC Trust Asset Pleadings	13383
3.	8/26/2015	Letter in Response to Case Management Order, dated August 19, 2015	13416
4.	9/3/2015	Scheduling Order Signed on 9/3/2015 Regarding Case Management Order Re: No-Strike, No Stay, Objection, and GUC trust Asset Pleading	13416
5.	9/10/2015	Certificate of Service	13428
6.	9/13/2015	Memorandum of Law Post-Closing Ignition Switch Accident Plaintiffs' Memorandum Of Law With Respect To Punitive Damages Issue	13434
7.	9/13/2015	Motion to Join Joinder of the Ignition Switch Plaintiffs and Non-Ignition Switch Plaintiffs to the Post-Closing Ignition Switch Accident Plaintiffs' Memorandum of Law With Respect to Punitive Damages	13436
8.	9/13/2015	Opening Brief By General Motors LLC With Respect To Whether Plaintiffs May Seek Punitive Damages From General Motors LLC Based On the Conduct Of General Motors Corporation	13437
9.	9/15/2015	Transcript regarding Hearing Held on 8/31/2015	13438
10.	9/22/2015	Post-Closing Ignition Switch Accident Plaintiffs' Reply with Respect to Punitive Damages Issue	13459
11.	9/22/2015	Reply Brief By General Motors LLC With Respect To Whether Plaintiffs May Seek Punitive Damages From General Motors LLC Based On The Conduct Of General Motors Corporation	13460

¹ The Appellants in this matter are (i) Benjamin W. Pillars [ECF No. 14034], (ii) the Pilgrim plaintiffs [ECF No. 14035]; (iii) certain Post-Closing Accident Plaintiffs [ECF No. 14036]; (iv) certain plaintiffs represented by Gary Peller, Esq. [ECF No. 14040], and (v) Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs [ECF No. 14042]. As long as a document (including any exhibit, annex, appendix or addendum thereto) was designated by one of the Appellants, it will not be repeated herein.

12.	9/22/2015	Joinder of the Ignition Switch Plaintiffs and Non-Ignition Switch Plaintiffs to the Post-Closing Ignition Switch Accident Plaintiffs' Reply With Respect to Punitive Damages Issue	13461
13.	10/15/2015	Transcript regarding Hearing Held on Wednesday, October 14, 2015 at 9:46 AM RE: Scheduling Order Signed on 9/3/2015 Regarding Case Management Order Re: No-Strike, No Stay, Objection, and GUC Trust Asset Pleading	13508
14.	12/15/2015	Notice of Appeal filed by Steve Berman on behalf of Ignition Switch Plaintiffs	13567
15.	12/18/2015	Notice of Appeal filed by William P. Weintraub on behalf of Hilliard Munoz Gonzales LLP and Thomas J. Henry Injury Attorneys	13572
16.	12/28/2015	Joint Notice of Appeal filed by Gary Peller on behalf of Paul Fordham, Tynesia Mitchell, Dierra Thomas, Momoh Kanu, Tina Farmer, Sharon Bledsoe, Celestine Elliott, Lawrence Elliott	13575
17.	12/28/2015	Appellants' Statement of the Issues on Appeal And Designation of the Items to Be Included in the Record on Appeal	13576
18.	12/28/2015	Statement of Issues and Designation of Items [corrected] filed by Gary Peller	13578
19.	12/30/2015	Statement of Issues / Adams Plaintiffs' Statement of Issues and Designation of Record on Appeal	13579
20.	11/10/2016	Status Report Pursuant to the Court's Order Setting Case Management Conference for 11:30 a.m., November 16, 2016, entered on October 18, 2016 [ECF No. 13775]	13786
21.	11/17/2016	Transcript Regarding Hearing Held on 11/16/2016 RE: Case Management Conference	13796

Dated: New York, New York
August 23, 2017

Respectfully submitted,

/s/ Arthur Steinberg
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